

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

JENNIFER LYNNE FAITH

NO. 3:21-CR-137-B

MOTION TO UNSEAL

COMES NOW the United States of America by and through the United States Attorney for the Northern District of Texas and respectfully moves that the Government's Sentencing Memorandum filed on March 22, 2022, be unsealed. In support, the government would show the following:

I.

On February 7, 2022, the defendant pled guilty to Count One of the superseding indictment charging her with violating 18 U.S.C. § 1958 (Use of Interstate Commerce Facilities in the Commission of Murder-For-Hire). Sentencing is scheduled for May 26, 2022. On March 22, 2022, the government filed a sentencing memorandum that includes a number of attachments.

Included within two of the attachments are graphic images. On March 17, 2022, the government filed a motion to seal the graphic images that appear in Attachments B and J of the sentencing memorandum. On March 22, 2022, the Court ordered the graphic images in Attachments B and J sealed.

II.

As part of the criminal investigation that resulted in the defendant's arrest, Darrin Ruben Lopez was indicted in Dallas County, Texas and charged with murder. Lopez is currently in custody awaiting trial. The government seeks to share the sentencing memorandum with the state prosecutors assigned to Lopez's case and with Lopez's defense attorneys. The government also wishes to share the sentencing memorandum with the victim's family so that they have a clear understanding of the facts of this case.

The government seeks to unseal the redacted version of the Government's Sentencing Memorandum that does not include the graphic images. The graphic images that are contained in Attachment B and J will remain sealed.

III.

The government respectfully requests that the redacted version of the Government's Sentencing Memorandum be unsealed.

Respectfully submitted,

CHAD E. MEACHAM
UNITED STATES ATTORNEY

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CERTIFICATE OF CONFERENCE

I certify that I conferred with attorneys representing Jennifer Lynne Faith on this motion, and they do not oppose it.

CERTIFICATE OF SERVICE

I hereby certify that on March 22, 2022, I electronically filed the foregoing document with the clerk for the United States District Court for the Northern District of Texas pursuant to its electronic filing system (ECF). The ECF sent a “Notice of Electronic Filing” to the attorneys of record who have consented to accepting service via this method.

Rick Calvert

RICK CALVERT

Assistant United States Attorney